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10 Attorneys for Plaintiffs

11 ROSEMARY ELORREAGA, et al.

12 **UNITED STATES DISTRICT COURT**

13 **NORTHERN DISTRICT OF CALIFORNIA**

14 ROSEMARY ELORREAGA, individually and  
15 as Successor-in-Interest to ROBERTO  
16 ELORREAGA; ROBERT PAUL  
17 ELORREAGA; RICHARD ANDREW  
ELORREAGA, and RONALD EDWARD  
ELORREAGA,

18 Plaintiffs,

19 vs.

20 ABB, INC., et al.,

22 Defendants.

Case No: 4:2-cv-05696-HSG

24 **STIPULATION AND ORDER TO  
EXTEND FACT DISCOVERY CUT-  
OFF TO TAKE THE DEPOSITION OF  
EXPERT SHELDON RABINOVITZ**

25 Judge: Hon. Haywood S. Gilliam, Jr.

26 Complaint Filed: September 23, 2020

27 Date Removed: July 26, 2021

28 Trial: October 31, 2022

24 TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:

25 Plaintiffs sought the deposition of Defendant Air & Liquid Systems, Inc., Successor-by -  
26 Merger to Buffalo Pumps' ("Buffalo Pumps") expert Sheldon Rabinowitz to take place before  
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1 the expert discovery deadline in this matter, but due to scheduling issues it cannot be taken until  
2 June 10, 2022. Plaintiffs and Defendant Buffalo Pumps, et al. stipulate that the deposition of  
3 Sheldon Rabinovitz can take place after the June 8, 2022, expert discovery cutoff. The extension  
4 applies only to the deposition of Sheldon Rabinovitz pursuant to FRCP 30(b)(6). This extension  
5 will not impact other deadlines in the Scheduling Order.

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7 Dated: June 3, 2022

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/s/H.W. Trey Jones

H.W. Trey Jones

Attorneys for Plaintiffs

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Dated: June 3, 2022

/s/ James G. Scadden

James G. Scadden

Attorney for Air & Liquid Systems Corp.

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**IT IS SO ORDERED.**

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Dated: June 7, 2022



Hon. Haywood S. Gilliam, Jr.

U.S. District Court Judge

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